

IN THE SUPREME COURT OF MISSISSIPPI

No. 2014-TS-01696

WELLNESS, INC., d/b/a WELLNESS
ENVIRONMENTS

APPELLANT

v.

PEARL RIVER COUNTY HOSPITAL

APPELLEE

**RESPONSE
TO WELLNESS' MOTION TO ENFORCE STAY OR
IN THE ALTERNATIVE TO QUASH SUBPOENA**

*** * * EXPEDITED CONSIDERATION REQUESTED * * ***

COMES NOW before the Court Mike Boleware, Hope Thomley, Performance Accounts Receivable, LLC, Performance Capital Leasing, LLC, Wade Walters, ProjX, LLC, Stepping Stones Healthcare, LLC, and Clay Deardorff, and in Response to the Motion of the Appellant Wellness to enforce the Supreme Court's Order To Stay,¹ would show the Court the following:

I. Facts and procedural background leading up to the contested subpoena.

On December 1, 2014, the Pearl River County Hospital ("PRCH") filed a First Amended Complaint in the Circuit Court of Pearl River County alleging a grand conspiracy.² The conspiracy is alleged to involve twelve of PRCH's former service providers. The alleged conspirators are Kingsbridge Holdings, Inc. (an Illinois based lender to PRCH) and Wellness Inc. d/b/a Wellness Enviroments (a Tennessee based equipment supplier), Piercon, Inc. (a local contractor), Dennis Pierce (a principal in Piercon), Mike Boleware (a former PRCH

¹ Wellness' Motion To Enforce Stay Or In The Alternative To Quash Subpoena will be referred to herein as the "Motion." The Response filed by the Pearl River County Hospital on April 23, 2015 will be referred to herein as the "PRCH Response."

² A copy of the First Amended Complaint is Exhibit A to the PRCH Response.

administrator), Hope Thomley (a health care consultant), Performance Accounts Receivable, LLC (a healthcare consulting firm), and Performance Capital Leasing, LLC (a medical equipment leasing company), Wade Walters (the owner of the Performance companies), ProjX (a Tennessee based architecture firm), Stepping Stones Healthcare, LLC (a therapy service provider) and Clay Deardorff (the owner of Stepping Stones).

Wellness moved the trial court to compel arbitration of all the claims against it. When the trial court denied the motion, Wellness appealed to the Mississippi Supreme Court. Wellness and PRCH both asked the Supreme Court for expedited consideration of the appeal. On January 14, 2015, the Supreme Court granted Wellness' Motion to Stay Trial Court Proceedings Pending Appeal. The Stay Order commanded that "All proceedings in Cause No. 2012-0277H in the Circuit Court of Pearl River County are stayed as to Wellness, Inc. d/b/a Wellness Environments, pending further Order of this Court."³

Kingsbridge likewise moved the trial court compel arbitration of all the claims against it, which motion the trial court denied. Then Kingsbridge appealed to the Mississippi Supreme Court. On January 22, 2015, the Mississippi Supreme Court granted Kingsbridge's Motion to Stay Trial Court Proceedings Pending Appeal. The Order commanded that "All proceedings in Cause No. 2012-0277H in the Circuit Court of Pearl River County are stayed as to Kingsbridge, pending further Order of this Court."⁴

The two Supreme Court stay orders halted all participation by Kingsbridge and Wellness in the Circuit Court proceeding. Likewise, the stay orders blocked discovery directed to

³ A copy of the 1/14/2015 Stay Order is Exhibit A to the Motion.

⁴ *Kingsbridge Holdings, LLC v. Pearl River County Hospital*, Supreme Court Cause No. 2015-TS-00075. A copy of the 1/22/2015 Stay Order to stay is attached hereto as Exhibit "A."

Kingsbridge and Wellness by the other parties in the Circuit Court litigation.

For the defendants remaining in the Circuit Court proceeding (hereinafter the “Remaining Defendants”), evidence from Kingsbridge and Wellness is crucial to rebut PRCH’s allegations of a conspiracy between them and Kingsbridge and Wellness. The PRCH claims against the Remaining Defendants are inextricably interwoven with PRCH’ claims against Kingsbridge and Wellness. Examples of PRCH’ conspiracy claims include the following from the First Amended Complaint:

**COUNT ONE: ACTIONS TO DEFRAUD THE HOSPITAL
AND MEDICARE**

70. The Defendants acted intentionally, willfully, wantonly, maliciously, for profit and without just cause or excuse to defraud the Hospital in order to increase fees paid by the Hospital to them.

...

75. Wade Walters and Wellness Environments engaged in the same practice at North Sunflower Hospital and Tallahatchie General Hospital.

76. Kingsbridge, Wellness, and Wade Walters knew, as vendors providing services to healthcare providers, that capital improvement projects could not be reimbursed in the year they were incurred. However, Kingsbridge, Wellness Environments and Wade Walters fraudulently represented to the Board that the renovation costs could be reimbursed if classified as a lease

**COUNT TWO: CIVIL CONSPIRACY TO TAKE OVER
OPERATIONS OF HOSPITAL FOR DEFENDANTS’ BENEFIT**

81. Wade Walters, individually and through his companies, conspired with his and its agents, namely, Hope Thomley and Mike Boleware, but also others, to unlawfully influence the Hospital to fraudulently abuse the Medicare reimbursement system in an effort to increase PAR's fees.

...

84. Clay Deardorff's payment to Wade Walters in order to secure the Stepping Stones contract aided Wade Walters and the other Defendants in establishing an intensive outpatient psychiatric program in a scheme to increase payments to PAR.

85. Kingsbridge and Wellness Environments represented to the Board of Trustees that the reimbursement treatment of the Wellness project sought not only to ensure the payment of Kingsbridge's and Wellness Environment's fees, but also to increase fees payable to PAR.

86. On information and belief, Kingsbridge and Wellness Environments "sell" their services and reimbursement theory together at various conferences focused on CAHs and Rural Healthcare. In addition, in September of 2013, when Wade Walters, PAR, Hope Thomley and Mike Boleware left the Hospital, Dave Stuart, an employee or agent of Kingsbridge, sent an email urging the Hospital's then counsel, to work with Wellness as the deals put together by the co-conspirators at the Hospital started falling apart.

The "Wellness project" mentioned in paragraph 85 is the apex of PRCH's conspiracy claims.

The Project was financed by Kingsbridge, with the Remaining Defendants having some connection in their various roles of service to PRCH.

After the Supreme Court stay orders as to Kingsbridge and Wellness, the Remaining Defendants were faced with procedural circumstances wherein: (1) the PRCH allegations of conspiracy against the Remaining Defendants are inextricably interwoven with the PRCH allegations against Wellness and Kingsbridge, (2) at the trial of this case, evidence from Kingsbridge and Wellness will be crucial for the Remaining Defendants to rebut the PRCH allegations of conspiracy, (3) Kingsbridge and Wellness could not participate in the trial until the Mississippi Supreme Court ruled on their respective appeals, and (4) the Supreme Court's stay orders precluded the Remaining Defendants from litigation discovery directed to Wellness and Kingsbridge. Coupled with all these, the discovery deadline set by the Circuit Court is April 30, 2015, and the trial date is June 15, 2015. Given this combination of circumstances, the Remaining Defendants filed motions asking the Circuit Court to stay the litigation temporarily, until the Mississippi Supreme Court ruled on Kingsbridge's and Wellness' appeals. The

Remaining Defendants noted for the trial court that if the Supreme Court denied Kingsbridge's or Wellness' requested relief and sent one or both of them back down to litigate in the Circuit Court, then additional discovery would be needed which would likely be duplicative discovery if the Circuit Court did not stay the proceedings. More importantly, the Remaining Defendants pointed out, if the Circuit Court did not stay the litigation and required the Remaining Defendants to go to trial without evidence from Kingsbridge and Wellness, the Remaining Defendants would be severely prejudiced and irreparably injured in their rights to obtain crucial, relevant evidence and present same to the jury. Further, the Remaining Defendants pointed out that if the Circuit Court granted the temporary stay, then whether the Supreme Court compelled arbitration or sent Kingsbridge and/or Wellness back to the Circuit Court, either way, at that point the Remaining Defendants could then conduct discovery and otherwise obtain evidence from Kingsbridge and Wellness for presentation at any trial of the case.⁵

At an April 2, 2015, hearing, the Circuit Court denied the requested temporary stay, holding that the Remaining Defendants could pursue discovery against Kingsbridge and Wellness notwithstanding the stay orders issued by the Mississippi Supreme Court.⁶ One of the core reasons for the Remaining Defendants' motion for stay of the Circuit Court proceedings was respect for the plain language of the Supreme Court's stay orders that "all" proceedings in the Circuit Court as to Wellness and Kingsbridge were stayed. The Circuit Court however ruled otherwise.

⁵ The Motions To Stay by the Remaining Defendants is attached hereto as cumulative Exhibit "B."

⁶ A copy of the transcript of the April 2, 2015, hearing before the Circuit Court is Exhibit C to the Motion. A written order of the trial court's rulings from the April 2, 2015 hearing has not been entered with the Circuit Clerk as of the date of this writing.

The Circuit Court's ruling placed the Remaining Defendants in a position to have to pursue discovery from Kingsbridge and Wellness to preserve their rights, though the Circuit Court's ruling runs contrary to the language of the Supreme Court stay orders. Therefore, on April 8, 2015, the Remaining Defendants petitioned the Circuit Court to order the Circuit Clerk to issue discovery subpoenas directed to Kingsbridge and Wellness.⁷ At the April 21, 2015 hearing on the petition, the Circuit Court signed the requested order.⁸ Later that day, the Pearl River Circuit Clerk issued the requested subpoenas, copies of which were provided to all counsel, including counsel for Kingsbridge and Wellness.⁹ The same day, counsel for Wellness filed the instant Motion To Enforce The Stay Or In The Alternative To Quash Subpoena.

II. Legal Argument

A. The Circuit Court abused its discretion in denying the Remaining Defendants' Motion To Stay.

It was an abuse of discretion for the Circuit Court to deny the Remaining Defendants' motion to stay the trial proceedings as to them until the Supreme Court ruled on the Kingsbridge and Wellness appeals. A temporary stay of the Circuit Court proceeding was necessary to preserve the rights of the Remaining Defendants to obtain evidence from Kingsbridge and Wellness, evidence that is essential to rebutting the allegations of conspiracy lodged by PRCH against the Remaining Defendants, and essential to a jury decision. The issues involving the Remaining Defendants are inextricably interwoven with the issues involving Kingsbridge and

⁷ A copy of the petition is Exhibit B to the Motion.

⁸ A copy of the order is Exhibit E to the Motion.

⁹ A copy of the subpoenas issued to Wellness is Exhibit F to the Motion. A copy of the subpoenas issued to Kingsbridge is attached hereto as Exhibit "C."

Wellness. Without evidence from Kingsbridge and Wellness, the Remaining Defendants would be deprived of their ability and right to present material, relevant evidence to the jury that would effect the jury's decision.

Section 3 of the Federal Arbitration Act requires a stay of litigation on “any issue referable to arbitration under an agreement in writing for such arbitration.” 9 U.S.C. § 3. Where litigation involves parties, some of which are signatories to an arbitration agreement and some of which are not, a non-signatory may obtain a stay against a signatory when the issues in the litigation between them substantially overlap with the arbitrable issues between the signatories. See *Harvey v. Joyce*, 199 F.3d 790, 795 (5th Cir.2000). A stay of the litigation proceedings as to non-signatories to an arbitration agreement is proper where the claims against the signatories (who are separately engaged in arbitration proceedings) and the non-signatories are inherently inseparable. *Hill v. G. E. Power Systems, Inc.*, 282 F.3d 343, 348 (5th Cir. 2002). In *Waste Management, Inc. v. Residuos Industrials Multiquam*, 372 F.3d 339 (5th Cir.2004), the Fifth Circuit identified factors for deciding when a non-signatory can obtain a mandatory stay of litigation under section 3 pending arbitration. Those factors are: (1) the arbitrated and litigated disputes must involve the same operative facts; (2) the claims asserted in the arbitration and litigation must be ‘inherently inseparable’; and (3) the litigation must have a ‘critical impact’ on the arbitration. *Id.* at 343.¹⁰

Even if a stay is not mandatory under Section 3, a stay of litigation may be necessary to protect litigant rights and guard judicial economy. See *In re Hornbeck Offshore Corp.*, 981 F.2d

¹⁰ The Mississippi Supreme Court has adopted the Fifth Circuit's instruction in *Waste Management, Inc. v. Residuos Industrials Multiquam*, 372 F.3d 339 (5th Cir.2004) for purposes of determining whether a particular claim falls within the scope of an arbitration agreement. *Freese v. Mitchell*, – So.3d –, 2014 WL 1946593 (Miss. 5/15/2014).

752, 755 (5th Cir.1993) (relying on *Moses H. Cone Memorial Hospital v Mercury Construction Corp.*, 460 US 1, 20, n. 23 (1983). See further, *Gupta v. Lynch*, 2014 WL 4063831 (E.D. La. 2014)(stay of litigation as to non-signatory).

The Mississippi Supreme Court has acknowledged that there is a strong federal policy favoring arbitration, *Pre-Paid Legal Services v. Battie*, 873 So.2d 79, 84 (Miss. 2004), that “when a court interprets such provisions in an agreement covered by the FAA, ‘due regard must be given to the federal policy favoring arbitration, and ambiguities as to the scope of the arbitration clause itself resolved in favor of arbitration.’ ” *Adams v. GreenPoint Credit, LLC*, 943 So.2d 703, 708 (Miss. 2006)(citing *Mastrobuono v. Shearson Lehman Hutton, Inc.*, 514 U.S. 52, 62 (1995) as quoting *Volt Information Sciences, Inc. v. Board of Trustees of Leland Stanford Junior Univ.*, 489 U.S. 468, 476 (1989)), and that Fifth Circuit’s rationale in *In re Hornbeck Offshore, supra*, may be properly applied to a non-signatory in litigation involving signatories to an arbitration agreement. *Adams v. GreenPoint Credit, LLC*, 943 So.2d at 710.

In the case sub judice, a temporary stay of the Circuit Court proceeding is necessary to preserve the rights of the Remaining Defendants. The presentation of the material evidence is essential to fair and just procedure. Justice is more nearly achieved when each side has reasonable access to the evidence of the other. *Box v. State*, 437 So.2d 19, 21 (Miss. 1983). In the criminal context, suppression by the prosecution of evidence favorable to an accused violates due process where the evidence is material either to guilt or to punishment, irrespective of the good faith or bad faith of the prosecution. *Manning v. State*, – So.3d –, 2015 WL 574726 (Nos. 1996-DP-00943-SCT, 1999-DP-01185-SCT, 2013-CA-00882, decided February 12, 2015). In the civil context, exclusion of evidence of probative value constitutes reversible error where the substantial rights of a party is prejudiced. *Kaiser Investments, Inc. v. Linn Agriprises, Inc.*, 538

So.2d 409, 417 (Miss.1989)(citing *Transcontinental Gas v. State Oil & Gas Board*, 457 So.2d 1298 (Miss.1984); *Planters Bank v. Garrott*, 239 Miss. 248, 122 So.2d 256 (1960)). In *Kaiser*, the Supreme Court reversed a lower court ruling, stating that evidence which was omitted was highly probative and a different verdict might have been reached had the jury heard that evidence. *Kaiser*, 538 So.2d at 417. See also, *Hurdle & Son v. Holloway*, 976 So.2d 386, 389 (Miss. App. 2008)("it is an 'immutable' aspect of due process that a person against whom evidence is to be used be afforded an opportunity to refute the evidence."). The Circuit Court abused its discretion when it denied the requested stay and directed that the Remaining Defendants could obtain discovery from Kingsbridge and Wellness

PRCH makes the same conspiracy and related claims against every defendant, and makes no distinctions between defendants in its claims. Thus, (1) the operative facts at issue in any arbitration involving Wellness and PRCH will be the same operative facts at issue in any litigation involving PRCH and the Remaining Defendants. Because PRCH makes the same conspiracy claims against every defendant, (2) PRCH has provided the Court with no basis to conclude that its claims can be separated. Finally, (3) given that PRCH alleges that each defendant is liable for the same damages, splitting the present litigation into two proceedings—one in court, another before an arbitrator—would prevent the arbitrator from fully resolving the present dispute, thereby critically impacting the arbitration. As a result, the circumstances identified in *Waste Management* are present here, and a stay of the Circuit Court proceedings should be granted. See the same analysis and holding in *Fin & Feather Chalets, LLC v. Southern Energy Homes, Inc.*, slip copy, 2014 WL 4354459 (E.D. La. 2014).

B. The Supreme Court's stay orders precluded "All" proceedings in the trial court as to Wellness and Kingsbridge.

The Supreme Court stay orders are clear in their language. All proceedings in the Circuit Court as to Kingsbridge and Wellness were stayed by these two orders. "All proceedings in the Circuit Court" includes discovery. Would anyone believe the Supreme Court stay orders allow PRCH to pursue discovery of evidence to support its claims against Wellness and Kingsbridge? Obviously not. Just as the Supreme Court stay orders prevented PRCH from pursuing discovery from Wellness and Kingsbridge, so did those stay orders prevent the Remaining Defendants from pursuing discovery from Wellness and Kingsbridge. The proper interpretation of the Supreme Court's stay orders is clear from their language. All proceedings in the Circuit Court are stayed. As a result, the Remaining Defendants were precluded from pursuing discovery from Wellness or Kingsbridge.

Thus given the inter-connectedness of all the claims and evidence, coupled with the temporary prohibition of discovery against Wellness and Kingsbridge, it was an abuse of discretion for the Circuit Court to deny the Remaining Defendants' motion for temporary stay. Added thereto, a temporary stay of the lower court proceeding as to all parties would not have worked prejudice on any party. It was a second error for the trial court to order that the Remaining Defendants could pursue discovery against Kingsbridge and Wellness in the face of the two Supreme Court stay orders. The second error was occasioned by the first. The Circuit Court's collision with the Supreme Court's stay orders was unnecessary. By refusing to grant the temporary stay of the trial proceedings, the Circuit Court put itself in a position of having to contradict the Supreme Court stay orders to allow the Remaining Defendants to conduct necessary discovery. Even with such forced construction, the Circuit Court's arrangement fails

to address the prejudice of the Remaining Defendants having to undergo unnecessary and duplicative discovery once the Supreme Court decides the Wellness and Kingsbridge appeals.

C. The Circuit Court proceeding should be stayed as to all parties.

The proper remedy in the current circumstances is for the Supreme Court to enforce its stay orders. The stay orders should indeed be enforced, but not in the limited manner of simply quashing the subpoenae. The Supreme Court should order that all proceedings in the Circuit Court as to all parties be stayed pending the Court's ruling on the Kingsbridge and Wellness appeals. Such ruling will protect the Remaining Defendants from the prejudice worked by the Circuit Court's denial of their motion to stay. Also, such ruling will uphold the clear language of the two previously issued Supreme Court stay orders as to Wellness and Kingsbridge.

If the Supreme Court does not stay all proceeding in the Circuit Court pending the decision on the Kingsbridge and Wellness appeals, then the Remaining Defendants urge the Court to clarify its previously issued stay orders so as to permit the Remaining Defendants to pursue discovery from Kingsbridge and Wellness. Such discovery is essential to protect the rights of the Remaining Defendants to a fair trial, by having access to evidence that is necessary for a fair and balanced presentation to a jury, and consequently necessary for the jury to reach a decision based on all the relevant evidence. However, this alternative does nothing to protect the Remaining Defendants from the duplicative discovery that will follow after the Supreme Court rules on the Kingsbridge and Wellness appeals.

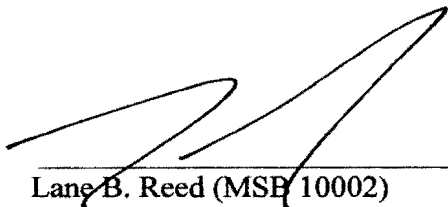
Therefore the Supreme Court should order the Circuit Court to stay all proceedings as to all Defendants until the Supreme Court has ruled on the Kingsbridge and Wellness appeals. Once the Supreme Court has ruled on those, then the two stay orders can be lifted. Then, whether the Supreme Court orders that arbitration is compelled or that Kingsbridge and/or

Wellness must proceed in the Circuit Court, either way, all the parties will then be entitled to pursue discovery against Kingsbridge and Wellness. Duplicate discovery will be thereby avoided; and the Remaining Defendants will be able to obtain evidence that is crucial to rebutting the PRCH allegations that the Remaining Defendants conspired with Kingsbridge and Wellness to cause injury to the Hospital.

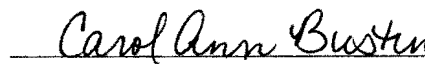
III. Conclusion

WHEREFORE, PREMISED CONSIDERED, the Supreme Court should order that all proceedings in the Circuit Court as to all parties be stayed pending the Court's ruling on the Kingsbridge and Wellness appeals. In the alternative, if this Court does not order that all proceedings in the Circuit Court be stayed, this Court should clarify its previous stay orders to permit the Remaining Defendants to have discovery of crucial evidence from Kingsbridge and Wellness.

RESPECTFULLY SUBMITTED, this 28th day of April, 2015



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CERTIFICATE OF SERVICE

I certify that I have this day served a true and correct copy of the foregoing RESPONSE via the Court's Mississippi Electronic Courts filing system upon the following attorneys:

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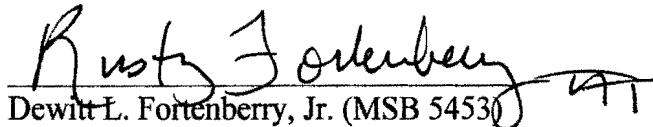
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Circuit Court Judge

DATED this the 28th day of April, 2015.

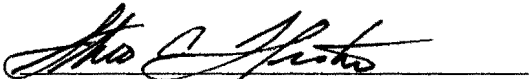

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